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Daniel B. Ruble
Daniel B. Ruble
Registration No. 40,794

DATE: August 25, 2003

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants:	Edlein et al	Group Art Unit:	1772
Serial No.:	09/657,679	Examiner:	S. Nolan
Filing Date:	September 8, 2000	Docket No.:	D-43378-01
Title:	PRINTED ANTIFOG FILM		

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Declaration of Mendy J. Mossbrook Under Rule 1.132

My name is Mendy J. Mossbrook. I am an inventor of U.S. Patent 6,231,953 to Mossbrook et al entitled "Method of Printing a Substrate and Article Produced Thereby."

I have worked for Cryovac, Inc. (subsidiary of Sealed Air Corporation) since July 1994. Since 1997, I have held the position of Product Development Engineer in the Printing Technology Department at Cryovac's Simpsonville, South Carolina facilities. Prior to working in the Printing Technology Department, I held positions as a Process Engineer in the Laminates Extrusion Department and also worked in Product Development developing non-shrink films, primarily in the produce film area. Since working in Printing Technology, my projects have included developing printing processes for shrink films, vertical form fill seal films, horizontal form fill seal films, and bag tubing. I have also developed energy curable inks, coatings and adhesives.

In 1994, I received a B.S. degree from Clemson University in Chemical Engineering, and in 2002, I received a Masters of Business Administration from Clemson University.

The Mossbrook '953 patent does not teach or describe a radiation-cured ink or a thermoset ink. Further, the Mossbrook '953 patent does not teach or describe a radiation-cured varnish or a thermoset varnish.

It is true that the Mossbrook '953 patent teaches that thermoplastic packaging films:

can be irradiated, which involves subjecting a film material to radiation such as high energy electron treatment. This can alter the surface of the film and/or induce crosslinking between molecules of the polymers contained therein.

(Column 9, lines 7-11.) This excerpt describes a method of changing the physical characteristics of a polymer film by irradiating the film. This irradiation procedure is a well-know method, for example, to improve the film's tensile strength properties and heat resistance by inducing cross-linking of polymer.

Such an irradiation procedure has nothing to do with radiation-*cured* inks and varnishes. Certainly, one of skill in this art would not refer to this irradiation of the Mossbrook film as "curing" the film, at the least because the polymers of the Mossbrook film are already polymerized into polymers before this irradiation exposure.


Further, neither the cited passage above nor the remainder of the Mossbrook '953 patent has anything to do with radiation *curing* of an ink or a varnish, as that term is understood by those of skill in the art. Radiation "curing" of an ink or varnish is quite different from the irradiation of a polymer as disclosed by the Mossbrook '953 patent.

A radiation-curable ink or varnish includes: i) monomers (e.g., low-viscosity monomers or reactive "diluent") and ii) oligomers/prepolymers (e.g., acrylates). It is by exposing these monomers and oligomers/prepolymers to an effective amount of radiation that a polymerization reaction takes place to change the radiation-curable ink or varnish from a fluid phase to a highly cross-linked or polymerized solid phase. The monomer and oligomers/prepolymer reactants of a radiation-curable ink or varnish system are "cured" by forming

new chemical bonds under the influence of radiation. The result is what those of skill in the art understand to be a radiation-*cured* ink or varnish.

The Mossbrook '953 patent fails to teach anything about radiation polymerization of monomer and oligomers/prepolymer reactants to change from a fluid phase to form a solid phase. The Mossbrook '953 patent does not disclose anything regarding a radiation-*curable* ink or varnish. Therefore, the Mossbrook '953 patent does not disclose anything regarding a radiation-*cured* ink or varnish. One of skill in the art would clearly distinguish the irradiation of polymers in a film -- as taught by the Mossbrook '953 patent -- from the irradiation of a radiation-*curable* ink or varnish to create a radiation-*cured* ink or varnish.

The undersigned Declarant acknowledges that willful false statements and the like are punishable by fine or imprisonment, or both (18 U.S.C. 1001) and may jeopardize the validity of the application or any patent issuing thereon. All statements made of the Declarant's own knowledge are true. All statements made on information and belief are believed to be true.


MENDY J. MOSSBROOK
Date: 8/21/03